



IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI

CATHERINE YOUNG

PLAINTIFF

v

CAUSE NO. 3:15cv810DPJ-FKB

TECHNOLOGY TRAINING SYSTEMS, INC.
D/B/A ANTONELLI COLLEGE
and JOHN AND JANE DOES 1-10

DEFENDANTS

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW, the Plaintiff, Catherine Young, and files this her Complaint against Technology Training Systems, Inc. d/b/a Antonelli College and John and Jane Does 1-10 to recover back wages, reinstatement, front pay, compensatory damages, punitive damages, costs and attorney's fees and any other relief to which she may be entitled and in support of this claim she states as follows:

PARTIES

1. The Plaintiff, Catherine Young, is an adult resident citizen of Brandon, Rankin County, Mississippi.

2. The Defendant, Technology Training Systems, Inc. d/b/a Antonelli College is a foreign for-profit corporation doing business in the State of Mississippi Rankin County, Mississippi. Technology Training Systems, Inc. d/b/a Antonelli College may be served with process by serving its registered agent, CT Corporation System, at 645 Lakeland East Dr., Suite 101, Flowood, Mississippi or wherever they may be found.

3. Defendants John and Jane Does 1-10 constitute the class of organizations, companies, or individuals unknown to Plaintiff at this time that

through their actions, negligence, conspiracy, concealment, or otherwise caused Plaintiff's damage. The group includes any owners, management entities, insurance companies, managers, or employees of the above named Defendants or any entity or individual related to them or associated with this business that caused or contributed to the injuries suffered by Plaintiff.

JURSIDICTION AND VENUE

4. This Court has subject matter jurisdiction over the claims alleged herein under the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000, *et seq.*, and the Fair Labor Standards Act of 1938 ("FLSA"), as amended, 29 U.S.C. 201, *et seq.*

5. Venue is proper in this district as the Defendant, Technology Training Systems, Inc. d/b/a Antonelli College, does business in this judicial district. In addition, the events and omissions giving rise to the claim occurred in this judicial district.

CAUSE OF ACTION

6. Plaintiff, Catherine Young, a female, began her employment with Defendant, Technology Training Systems, Inc. d/b/a Antonelli College around March 2009 and was terminated on October 23, 2009. She was then rehired on March 8, 2010 as an associate admissions representative. She was later promoted to Associate Director of Admissions on July 1, 2013 and terminated from her employment on July 10, 2014.

7. At all times relevant and material, Plaintiff was an employee of Defendants within the meaning of Title VII of the Civil Rights Act and the FLSA.

8. Plaintiff began participating in an overtime lawsuit against the Defendant around May 24, 2013. It is Plaintiff's understanding and belief that the Defendants found out she was participating in the overtime lawsuit around August 2013.

9. Plaintiff began experiencing retaliation under both Title VII and the FLSA

due to her participation in this lawsuit.

10. Plaintiff only began receiving write-ups from the Defendants after she began participating in the overtime lawsuit.

12. The Defendants gave Plaintiff no reason for her termination. Any reason they may now give is only a pretext.

13. In addition, Plaintiff believes she was discriminated against due to her sex, being a female. She was the only female in management at the Flowood, MS location and she was treated differently than other male employees during her employment and when she was terminated.

14. The Defendants' actions towards the Plaintiff were done in violation of her federally protected rights. Plaintiff was discriminated against on the basis of her sex and in retaliation for her participation in the overtime lawsuit.

15. The Defendants actions caused Plaintiff to suffer embarrassment, emotional distress, anxiety and stress.

16. The Defendants actions were in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000, *et seq.* and the Fair Labor Standards Act of 1938, 29 U.S.C. 201, *et seq.*

17. As a result of the Defendants' wrongful conduct, Plaintiff is entitled to an award of damages and all other available relief under Title VII of the Civil Rights Act of 1964 and the Fair Labor Standards Act as amended (including, without limitation, lost wages and liquidated damages equal to the lost wages, interest, reinstatement to previous position or front pay, emotional distress damages, attorneys' fees, litigation expenses, costs and punitive damages).

17. In addition, the Defendants negligently and/or intentionally inflicted

emotional distress upon the Plaintiff by their conduct. Said conduct was outrageous and caused Plaintiff severe emotional distress.

18. As a result of said conduct, Plaintiff suffered damages including, but not limited to, lost wages and benefits, both past and future, physical pain and suffering, mental and emotional distress and loss of enjoyment of life and is entitled to recover damages.

EOC PROCEEDINGS

19. Plaintiff timely filed a Charge of Discrimination with the EEOC on November 13, 2014. A copy of said Charge is attached hereto as Exhibit "A" and incorporated by reference.

20. Plaintiff was sent her Notice of Right to Sue by the EEOC on August 11, 2015 and this civil action is timely filed. See letter attached hereto as Exhibit "B" and incorporated by reference.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for the following relief:

- a. Lost wages and liquidated damages equal to the lost wages;
- b. Front pay;
- c. Reinstatement;
- d. Compensatory damages for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and other non-pecuniary losses;
- e. Past and future doctor, hospital, drug and medical bills;
- f. Interest;
- g. Punitive damages;
- h. Reasonable costs and attorneys' fees; and

i. All other relief to which she may be entitled.

Respectfully submitted, this the 9th day of November, 2015.

CATHERINE YOUNG



Teresa E. Harvey

PREPARED BY:

TERESA E. HARVEY (MSB#100442)
CG LAW GROUP, P.A.
120 NORTH CONGRESS ST.
SUITE 200
JACKSON, MS 39201
601-948-8005
601-948-8010 (FAX)
tharvey@cglawms.com